



**Integra Telecom, Inc.**

Received & Inspected

1201 NE Lloyd Blvd.  
Suite 500  
Portland, OR 97232  
Phone: 503.453.8000

**FEB 12 2010**

February 5, 2010

FCC Mail Room

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

*Via Overnight Delivery to:  
9300 East Hampton Drive  
Capitol Heights, MD 20743*

**Re: EB Docket No. 06-36, Certification of CPNI Filing for Calendar Year 2009  
Integra Telecom Holdings, Inc. (FRN 0004257010) and Subsidiaries**

Dear Ms. Dortch:

Enclosed please find the original and four copies of the Calendar Year 2009 CPNI Certification Filing of Integra Telecom Holdings, Inc. and its operating subsidiaries. Should you or Commission Staff have any concerns regarding this filing, please contact the undersigned.

Sincerely,

Cathy Murray  
Manager, Regulatory Affairs  
Integra Telecom  
Phone: 763-745-8466  
Fax: 763-745-8459  
Email: [camurray@integratelecom.com](mailto:camurray@integratelecom.com)

Enclosures: Certification  
Statement of Compliance

Cc: Best Copy and Printing, Inc.  
445 12<sup>th</sup> Street Suite CY-B402  
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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

**Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009**

1. Date filed: February 5, 2010
2. Name of company(s) covered by this certification, including Form 499 Filer IDs: Integra Telecom Holdings, Inc. (FRN: 0004257010) and its operating subsidiaries:

| <u>Company Name</u>                               | <u>Form 499 Filer ID</u> |
|---|--------------------------|
| Integra Telecom of Minnesota, Inc. ....           | 819168                   |
| Integra Telecom of North Dakota, Inc. ....        | 825424                   |
| Integra Telecom of Oregon, Inc. ....              | 816734                   |
| Integra Telecom of Utah, Inc. ....                | 820650                   |
| Integra Telecom of Washington, Inc. ....          | 820760                   |
| Electric Lightwave, LLC.....                      | 808575                   |
| Scott-Rice Telephone Company .....                | 801030                   |
| Eschelon Telecom, Inc. <sup>1</sup> .....         | 823930                   |
| Advanced TelCom, Inc. ....                        | 817168                   |
| Shared Communications Services, Inc. ....         | 802188                   |
| Mountain Telecommunications of Arizona, Inc. .... | 818794                   |
| OneEighty Communications, Inc. ....               | 821850                   |
| Oregon Telecom, Inc. ....                         | 823244                   |
| United Communications, Inc. d/b/a UNICOM .....    | 801543                   |

3. Form 499 Filer ID: Please see 2., above
4. Name of signatories:
5. Title of signatories:

Julie Rouzee, Chief Information Officer  
Trent Anderson, V.P. Product Development & Marketing

6. Certification:

The above named company representatives, certify that Ms. Rouzee is an officer of the company named above, Mr. Anderson is a senior executive of the company named above, and that both, acting as agents of the company, have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

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<sup>1</sup> Eschelon Telecom, Inc. and its subsidiaries, Eschelon Telecom of Arizona, Inc.; Eschelon Telecom of Colorado, Inc., Eschelon Telecom of Minnesota, Inc., Eschelon Telecom of Nevada, Inc., Eschelon Telecom of Oregon, Inc., Eschelon Telecom of Utah, Inc. and Eschelon Telecom of Washington, Inc.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Signature

Julie Rouzee  
Chief Information Officer  
Integra Telecom Holdings, Inc.

  
\_\_\_\_\_  
Signature

Trent Anderson  
V.P. Product Development & Marketing  
Integra Telecom Holdings, Inc.

**Attachment:** Accompanying Statement explaining CPNI procedures

**INTEGRA TELECOM HOLDINGS, INC.**  
**2009 STATEMENT OF COMPLIANCE**

The operating procedures of Integra Telecom Holdings, Inc. and its operating subsidiaries:

Integra Telecom of Minnesota, Inc.,  
Integra Telecom of North Dakota, Inc.,  
Integra Telecom of Oregon, Inc.,  
Integra Telecom of Utah, Inc.,  
Integra Telecom of Washington, Inc.,  
Electric Lightwave, LLC dba Integra Telecom,  
Scott-Rice Telephone Company dba Integra Telecom,  
Eschelon Telecom of Arizona, Inc. dba Integra Telecom,  
Eschelon Telecom of Colorado, Inc. dba Integra Telecom,  
Eschelon Telecom of Minnesota, Inc. dba Integra Telecom,  
Eschelon Telecom of Nevada, Inc. dba Integra Telecom,  
Eschelon Telecom of Oregon, Inc. dba Integra Telecom,  
Eschelon Telecom of Utah, Inc. dba Integra Telecom,  
Eschelon Telecom of Washington, Inc. dba Integra Telecom,  
Advanced TelCom, Inc. dba Integra Telecom (including Shared Communications Services, Inc.),  
Mountain Telecommunications of Arizona, Inc. dba Integra Telecom,  
OneEighty Communications, Inc. dba Integra Telecom,  
Oregon Telecom, Inc. dba Integra Telecom,  
United Communications, Inc. d/b/a UNICOM dba Integra Telecom;

(together, “Integra” or “Company”) ensure compliance with the FCC’s CPNI Rules. Such procedures are as follows:

***Use of CPNI in Marketing***

Before soliciting customer consent for the use of CPNI to market the Company’s communication-related services, Integra gives each customer notice of his or her right to restrict use and disclosure of, and access to, his or her CPNI, in compliance with FCC Rule 64.2008. The Company maintains a record of these notifications for at least one year.

Integra makes limited, one-time use of CPNI to market our communication-related services only in compliance with FCC Rule 64.2008.

The Company has implemented processes through which the status of a customer’s CPNI approval can be clearly established prior to the use of CPNI.

On occasion the Company may access and use its customers’ CPNI to market its own communication-related services only after the customers’ opt-out consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer. At least every two years the Company provides notice of customers’ rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and solicits opt out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008.

Integra has a supervisory review process regarding our compliance with the FCC’s CPNI rules for any outbound marketing efforts.

### ***CPNI Safeguards***

Integra has designated a compliance officer to oversee the maintenance and security of the Company's CPNI records and the direction of the training of all company employees.

Integra trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and the Company has an express disciplinary process in place if the rules are violated.

The Company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

The Company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

The Company discloses CPNI to a customer in person at its local market offices only when the customer presents a valid photo ID and the ID matches the name on the account.

The Company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

The Company has established password protection for customers' online accounts.

The Company has a process in place to notify customers of changes in: a customer password or response to back-up means of authentication, online account, or address of record.

### ***CPNI Recordkeeping and Reporting***

Integra maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI. The Company maintains these records for at least one year.

Integra is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

The Company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. The Company may also notify the customer of such breach, after consulting with the investigatory agency(ies), if it believes there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. Integra will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that the Company postpone disclosure to the customer.

Integra will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.